

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	Case No. 19-cr-10335-DJC
)	
TANMAYA KABRA,)	
Defendant.)	
)	
_____)	

**GOVERNMENT'S ASSENTED-TO MOTION FOR LEAVE TO FILE
EXHIBITS TO ITS SENTENCING MEMORANDUM UNDER SEAL**

Pursuant to Local Rule 7.2, the Government requests the Court's permission to file under seal the exhibits to its forthcoming sentencing memorandum.

As grounds for this motion, the Government states as follows:

1. On April 8, 2021, defendant Tanmaya Kabra pled guilty to four counts of wire fraud in violation of 18 U.S.C. § 1343.
2. A sentencing hearing in this matter is set for September 15, 2021. The Government anticipates filing a sentencing memorandum and exhibits thereto in advance of the hearing.
3. The exhibits to the Government's forthcoming sentencing memorandum identify Kabra's victims by name, refer to the amount of their losses, and otherwise describe and identify them. The exhibits also contain information identifying third parties and containing confidential financial information.
4. Under the Crime Victim Rights Act, Kabra's victims have the right to be treated with respect for their dignity and privacy. 18 U.S.C. § 3771(a)(8). Accordingly, to protect the privacy of Kabra's victims, as well as to protect the privacy of third parties and to prevent the

dissemination of confidential financial information, the Government requests leave to file the exhibits to its sentencing memorandum under seal.

5. Counsel for Kabra has informed the Government that he assents to the Government's request for leave to file the exhibits to its sentencing memorandum under seal.

WHEREFORE, the Government respectfully requests that the Court grant this Motion for leave to file its motion for restitution under seal.

Respectfully submitted,

UNITED STATES OF AMERICA,

By its attorney,

NATHANIEL R. MENDELL
Acting United States Attorney

/s/ Christopher Looney
Christopher Looney
James D. Herbert
Assistant U.S. Attorneys
1 Courthouse Way, Suite 9200
Boston, MA 02210
617.748.3100

Dated: September 7, 2021

CERTIFICATE OF SERVICE

Undersigned counsel certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Christopher Looney
Christopher Looney
Assistant United States Attorney

Dated: September 7, 2021